These service calls were provided without charge, regardless of the problem encountered. Of course, these charges were not actually provided free of charge. Rather, they were factored into the cost of providing cable television service and reflected in the Tallahassee system's pre-September 1, 1993 rates. Pursuant to the mandate of Section 76.923, however, a cable system must now unbundle such charges and recoup them as part of an equipment basket charge.

The hourly service charge of $25.66 pertains to all service calls relating to customer-owned equipment. Customer-owned wiring and equipment consists of internal cable wiring which Comcast subscribers own pursuant to their subscription agreement with the company as well as any video components and equipment (TVs, VCRs, remotes, converters) which the subscriber has purchased from others. It does not pertain to service calls required to repair or maintain company-owned equipment, which continues to be provided free of charge. Customers were apprised of the hourly service charge by our advertisement in the local newspaper, The Tallahassee Democrat, on August 30 and 31, 1993 in accordance with paragraphs 7 and 8 of the Commission's July 27, 1993 Order preempting its own and local notice requirements. Copies of the advertisement from the Democrat are enclosed for your reference.

3. CableGuard.

As noted above, the Commission's rules require cable operators to unbundle equipment and service rates. Prior to September 1, 1993 Comcast provided unlimited customer premises visits, regardless of the cause or source of the problem, at no additional charge to its customers. The equipment/service unbundling requirement precludes the company from continuing to subsidize the cost of such visits in the monthly charge for cable services. Instead, recovery of these costs is now governed by the hourly service charge concept set forth in 47 CFR Section 76.923. While we continue to service any problems with our own equipment with no charge to the customer, service calls for customer-owned equipment and wiring are now charged in accordance with the hourly service charge (HSC).

Following the requirements of Section 76.923 we determined the number of service calls the system made in 1992 for non-company owned equipment problems, used the HSC methodology to determine our actual cost for providing these service calls, and divided the sum in order to derive a per-subscriber per-month cost for servicing subscriber equipment. This number was unbundled and shown as a separate line item on the subscriber's bill.

It seems a great deal of confusion has arisen regarding what CableGuard is and what it is not. CableGuard is not a charge for a new service. Rather it is the unbundled itemized charge for services which all subscribers previously received as part of their basic subscription fee, namely service calls for customer-owned equipment.

Purchase of CableGuard maintains the <u>same</u> level of service the customer was receiving prior to September 1, 1993. Customers who do not wish to maintain the same level of service are free to eliminate the charge at any time or to decline the coverage in the first instance. By including the charge on the bill, we have assumed only the customer's wish to continue receiving the <u>same</u> level of service they received prior to September 1. A pamphlet distributed to each customer with their first post-September 1 bill explained that certain service calls would be charged at the HSC, what CableGuard was and their option to reject CableGuard if they desired to change their current level of service. (See attached pamphlet at questions 6 and 7). As of today, 732 subscribers have notified us that they do not wish CableGuard.[1]

Nowhere do the Commission's <u>Orders</u> or regulations indicate that an operator was to unilaterally diminish the services a customer was receiving prior to September 1. To the contrary, if anything, the Commission's rules demonstrate a bias for maintaining a subscriber's existing level of service, absent specific instructions from the subscriber to the contrary. For instance, customers with converters received an unbundled equipment charge for that converter. The company did not assume the customer no longer wanted the converter because there was now a charge associated with it. Similarly, the Commission instructed that existing services could be rearranged without the affirmative consent of the subscriber since it was sensible to assume the customer wished to continue receiving the same services he received prior to September 1. See <u>First Report and Order</u> at ¶ 440.

Had we not followed this methodology, subscribers would have automatically become subject to the $25.66 hourly service charge for service calls related to non-company equipment. Such a result

[1] We have also found that slightly more than one percent of new connects since September 1 have declined CableGuard.

is not compelled by the Commission's rules and is not in either the customer's or the company's best interest. Let me elaborate.

Because service calls have always been provided without charge regardless of the source of the problem, customers have become accustomed to calling the cable company for any and all service problems with their television reception. As noted above, service calls which have been routinely made to resolve problems without a separate charge, (such as the TV improperly tuned to the wrong channel, VCR and TV improperly connected, problems with internal wiring and remote controls, etc.) will now be subject to the HSC. Our concern was that customers who requested such service calls starting September 1 would be shocked to learn that they were responsible for a $25.66 per hour charge. In the worst case, this could lead to confrontations with our service employees; in the best case, it is customer-unfriendly.

Moreover, due to the fact that the charges for additional outlets have been eliminated, we anticipate that there will be a dramatic increase in the number of subscribers making their own connections to our service. This we expect will be accompanied by an increase in signal radiation due to improperly performed connections and/or the use of sub-standard materials. But regardless of who performs the wiring, the cable operator remains liable for any signal leakage attributable to home wiring pursuant to Section 76.801 of the Commission's rules. The system will necessarily, therefore, be increasing its leakage patrolling with the consequence that any sub-standard wiring which is installed will have to be removed and repaired by the company at the HSC hourly rate.

By contrast, CableGuard includes free service calls for all internal wiring whether installed by the company or not. The CableGuard charge of $0.45 is based strictly on historical service data and is priced at cost. Thus, any significant increase in the number of service hours devoted to home wiring and customer equipment will mean CableGuard revenues will not even recover the costs of providing the service to the system's subscribers.

It needs to be emphasized that the charge for CableGuard is based on the Company's historical costs for providing service to non-company owned equipment computed as prescribed by the Commission. There is no mark-up. The reasonableness of the charge is evident when compared to similar fees for the maintenance of customer premises equipment charged by the phone companies serving the Tallahassee area. Sprint/Centel charges $85 per hour or $1 per month for wire maintenance protection. The RBOC serving Tallahassee, Southern Bell, charges $46.50 for the first 15 minutes, $87 for an hour's service call and $2.50 a month for wire maintenance.

4. Value Pac. Starting September 1, 1993, the system offered its subscribers an opportunity to subscribe to four channels on an a la carte basis. Value Pac consists of the four channels which are listed under that heading on the attached rate card. These channels are TNT, WTBS, The Family Channel and The Nashville Network. The price for each of the services on a stand alone basis is $0.33 with the exception of TNT which is priced at $0.49 per month. "Value Pac" refers to the discounted price to receive all four services. The price for Value Pac is $0.65 per month. Subscribers were informed of the prices for the a la carte services and Value Pac in our August advertisements in The Democrat as well as the pamphlet which accompanied their first post - September 1 bill. The pamphlet (enclosed) also described a subscriber's options to continue receiving some, all or none of the four services (Question 5). As of today, 652 subscribers have chosen to not receive Value Pac.

Each of the services was carried on the system as part of our expanded basic service prior to September 1, 1993 as indicated on the attached channel lineup. Because they are now offered on an a la carte basis, subscribers may buy them either alone or together as Value Pac without buying through any other level of service. In ther words, a basic subscriber who pays $8.13 now has access to 11 of the a la carte services. Thus, subscribers who are on a estricted budget or whose viewing needs do not require the dditional seventeen channels which we offer on our cable rogramming services tier, have greater options than before. Likewise, subscribers to our cable programming tier who in the past received these four services need no longer take them if they do not wish to.

Tallahassee is a system which employs programmable and addressable converters rather than traps for signal security. In light of these facts, we believed the best way to introduce a la carte services would be with converter security. This means that subscribers who do not wish to receive Value Pac and did not already have a converter would have to receive one. As with service calls, the system did not previously charge for converters. They were issued free of charge to any subscriber requiring one. As a result of the unbundling requirement contained in Section 76.923 the system now charges for converters issued to subscribers.

The charge is $1.04 per month. Initially, this situation resulted in thirty-five subscribers being charged the $1.04 converter charge when they requested to not receive Value Pac. Although this appears to be the correct application of the Commission's unbundling rule, after this fact was drawn to our attention, the company determined to waive this equipment charge and to credit those thirty-five subscribers who have paid it at any time since September 1. With this minor adjustment, there are no equipment charges to subscribers to receive or secure against receipt of any of the Value Pac services.

Another by-product of the new HSC methodology is that the system now has a formula-based charge for trip calls to effectuate changes of service. In Tallahassee the charge is $19.25 per trip. The provisions of 76.980 require only a thirty-day grace period for changes in service level following a change in rates. However, in the case of changing from Value Pac to the a la carte services and vice-versa, or discontinuing the Value Pac service, the system has elected to extend the grace period for an indefinite time.

Your letter requested Comcast to demonstrate how its package of a la carte services meets the Commission's requirements specified in its Report and Order to qualify as a permissible unregulated package of a la carte channels. The restructuring was done in strict accordance with each of the requirements laid down by the Commission in the Report and Order and the Freeze Order. In particular, it is important to note that the establishment of Value Pac was a revenue neutral event since it was priced consistent with the system's maximum initial permitted rate. Thus, as detailed below, no subscriber is paying more than they would under the Commission's benchmarks for these services, but some subscribers are now paying less.

A. Value Pac Meets the Commission's Definition of an Unregulated Service.

The First Report and Order at paragraphs 327 and 328 states that the Commission will not regulate collective offerings of otherwise exempt per channel offerings provided two conditions are met. Those conditions are that the price for the combined package must not exceed the sum of the individual charges for the individual services and each service must be offered on a stand-alone basis. Each of the four channels other than TNT is available on a stand-alone basis at a cost of $0.33 per month. TNT is sold for $0.49 per month. Subscribers may purchase all four at the collective discount price of $0.65 per month.

B. The Creation of Value Pac Does Not Contravene the FCC's Rate Regulations.

The First Report and Order is quite clear that cable operators have the ability to rearrange existing services. In so ruling the Commission recognized that it would be imprudent and burdensome to require subscribers to resubscribe simply because services they had been receiving had been rearranged to another level of service.

> "Thus, on balance, we conclude that the consumer benefits from giving operators the ability to diversify, improve or otherwise modify their offerings in a tier outweighs the slight reduction of consumer choice that would result from exempting such changes from the negative option billing requirements. We also observe that if we subjected relatively minor tier changes to the scope of the provision, subscribers might well perceive the need to resubscribe each time such a change occurred as a burden, rather than a benefit." First Report and Order at ¶440.

This position was forcefully reiterated in the Second Report and Order[2]. The rearrangement was explicitly not restricted to shifts among regulated tiers.[3] Thus, the Commission's policy allows operators to restructure regulated tier offerings and in some cases to move channels to deregulated status.

During the rate freeze period, such restructuring of restructure rates and services are subject to two conditions. First, the restructuring must not result in a change in the fundamental nature of the tier.[4] Second, during the period that rates are frozen, the restructuring must not result in an increase

[2] Second Report and Order at ¶86 and note 127.

[3] "We also do not believe that anything in the Act requires us to restrict movement of a channel to premium and deregulated status." First Report and Order at note 1105.

[4] [A]s Congress intended,...a change in the mix of channels in a tier, including additions or deletions of channels, will not be subject to the negative option billing provision, unless they change the fundamental nature of the tier." Order, MM Dkt. 92-266, FCC 93-177, ¶440 (released May 3, 1993).

in the average monthly subscriber bill.[5] While the Commission has not defined what constitutes a "fundamental change, in the nature of a tier," we certainly believe that the shift of one out of thirteen basic services (WTBS) and three out of twenty cable programming services (TNT, Family Channel, Nashville Network) does not approach the level of a fundamental change envisioned by the Commission.[6] And as demonstrated by the attached rate freeze computation form, the average subscriber bill has gone down.

C. The Cost of Value Pac Conforms to the Maximum Initial Permitted Rate and Therefore Cannot Constitute a Rate Evasion.

In paragraph 451 of the First Report and Order, the Commission generically defined a rate evasion as any practice or action which avoids the provisions of the Act, the Commission's rules or the policies underlying either. Among Congress' objectives in adopting the 1992 Cable Act were to foster the development of a la carte services since this would give consumers greater personal control over the programming they received, and to ensure reasonable rates for groupings of services, (traditionally known as "basic") which are not offered on a stand alone basis. Value Pac is entirely consistent with both of these policies and the Commission's rules effectuating these policies. Moreover, since Value Pac is being offered at a rate which is identical to the rate the company would be entitled to charge were the services being offered as part of its cable programming services tier, it cannot possibly be considered to constitute a rate evasion.

On September 30, 1992 the system's rate for its 13 channel limited basic service was $7.95 and the rate for its 20 channel expanded basic service was $11.60, for a total of $19.55. Premium programming offered by the system consisted of 4 channels. Subscribers did not have the option of subscribing to any of the

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[5]"This freeze does not preclude adding subscribers, retiering, or . . . . providing . . . additional equipment and services as long as the average monthly subscriber bill for these services does not increase . . ." Freeze Order, 8 FCC Rcd 2921, 2922 (1993) ("Freeze Order").

[6]Compare with the First Report and Order at note 1100 where the Commission opined that the deletion of all existing services on a tier would constitute a fundamental change.

premium services without the purchase of both basic service and expanded basic service. Today they have the option of purchasing 8 services on a stand alone basis and basic subscribers may buy each of them without having to buy-through a cable programming services tier.

As of September 1, 1993, the system began to offer basic service, consisting of 12 channels for $8.13 and cable programming service, consisting of 17 channels for $11.82. The discounted price for the 4 channel Value Pac is $.65, resulting in a total subscriber charge of $20.30 for 33 channels of service. Had Comcast not offered its subscribers the option of purchasing the Value Pac channels in a package or on an a la carte basis, the rate for 33 channels of programming (13 channels of limited basic service and 20 channels of cable programming service) would have also been $20.30 ($8.00 for limited basic service and $12.30 for expanded basic service) pursuant to the Commission's benchmarks.

D. <u>Value Pac Offers a Realistic Alternative to Consumers</u>

The Commission asks that we explain why our a la carte services present a realistic option to subscribers. The answer to that question is a summary of that which has already been stated.

1. Each service is offered on a stand-alone basis;

2. The price to receive the package equals the benchmark rate the system would be permitted to charge for the four services.

3. Basic customers are able to purchase the services without buying through the cable programming services tier;

4. There are no impediments to purchasing the services in the nature of transaction or equipment fees.

I believe the above demonstrates that the CableGuard and Value Pac services bring new choices and value to subscribers within the structure of the Commission's regulations. Certainly, that was our intention. As described in this letter and confirmed by the Rate Freeze Computation Form, neither of these services resulted in additional revenues to the system over and above what it was receiving prior to April 5, 1993. Indeed if CableGuard and Value Pac had not been established, the system's revenue would in total be the same, albeit in the form of steep hourly service charges and marginally higher rates for our programming tiers.

I trust that you will find this letter fully responsive to your inquiry. Please contact me if you require any additional information.

Very truly yours,

Patrick Keating
General Manager

cc: City of Tallahassee Cable Administrator

Comcast Cablevision
3760 Hartsfield Road
Tallahassee, Florida 32303

ORIGINAL

Customer Service (904) 574-4000
Administration FAX (904) 574-4030
Advertising Sales (904) 574-4060
Advertising Sales FAX (904) 574-4031

COMCAST

RECEIVED

DEC 2 0 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 20, 1993

Via Hand Delivery

Mr. Roy J. Stewart
Chief, Mass Media Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: Your File No. LOI-93-2

Dear Mr. Stewart:

On December 17, 1993, Comcast Cablevision filed a response to the above-referenced matter regarding cable television rates in Tallahassee, Florida. Attached is an original signature page which should be substituted for the facsimile of the signature page that was filed with the response.

Sincerely,

Patrick Keating
General Manager

/rsr
Enclosure(s)
cc: City of Tallahassee Cable Administrator

ORIGINAL
RECEIVED
DEC 2 0 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I believe the above demonstrates that the CableGuard and Value Pac services bring new choices and value to subscribers within the structure of the Commission's regulations. Certainly, that was our intention. As described in this letter and confirmed by the Rate Freeze Computation Form, neither of these services resulted in additional revenues to the system over and above what it was receiving prior to April 5, 1993. Indeed if CableGuard and Value Pac had not been established, the system's revenue would in total be the same, albeit in the form of steep hourly service charges and marginally higher rates for our programming tiers.

I trust that you will find this letter fully responsive to your inquiry. Please contact me if you require any additional information.

Very truly yours,

Patrick Keating
General Manager

ATTACHMENT 1

FOX KIDS CLUB

ARE YOUR KIDS MISSING OUT?
Call 904 [illegible] to sign up.
It's FREE!
FOX 49 KIDS CLUB

TALLAHASSEE RATE CARD

(Effective September 1, [illegible])

Programming Services*

Limited Basic	8.13
Standard Service	11.52
Value Pak (see below)	.66
Preferred Service (includes Limited Basic, Standard Service, and Value Pak)	20.30

Equipment Rental

Addressable Converter	2.46
Standard Converter	1.04
Remote Control	.43

Other Services*

Additional Outlet	No Charge
Guide	.75
Pay-Per-View	Prices Vary

Service Charges

[illegible]	.46
New Connect Installation Charge	51.38
Prewired New Connect	38.40
Reconnect	[illegible]
Additional Outlet/Relocate Outlet (initial installation) - per outlet	12.[illegible]
Additional Outlet/Relocate Outlet (separate trip) - per outlet	25.[illegible]
Hourly Service Charge/Custom Install	25.[illegible]
Change of Service Charge (home visit required)	19.25
Change of Service (no home visit required)	1.[illegible]

Premium Service Programming (purchased separately)*

HBO	12.[illegible]
Cinemax	12.[illegible]
Showtime	12.[illegible]
Disney	12.[illegible]
Additional Outlet Premium(s)	3.00

Value Pak Services (purchased separately)*

[illegible]	.40
[illegible]	.33
Family Channel	.33
The Nashville Network	.33

Premium Service Packages*

Value Package* (Preferred Service, HBO, Showtime and Guide)	[illegible]
Family Package* (Preferred Service, Showtime, The Disney Channel and Guide)	[illegible]

*Applicable equipment rental charges not included.

Applicable fees and taxes will apply.

ATTACHMENT 2

COMCAST CABLEVISION OF TALLAHASSEE
1993 CHANNEL LINE-UP

2 WTBS
3 TNT
4 CNN
5 WFSU
6 USA Network
7 WTXL
8 ESPN
9 WCTV
10 WTLH
11 QVC Home Shopping
12 WTWC
13 Nickelodeon
14 HBO
15 Showtime
16 The Disney Channel
17 Cinemax
18 Prevue Guide
19 E! Entertainment
20 C-SPAN/Local Origination
21 Channel Line-Up
22 The Family Channel
23 Sunshine Network
24 The Nashville Network
25 WABW
26 CNN Headline News
27 Lifetime
28 WALB
29 The Discovery Channe
30 Arts & Entertainment
31 The Weather Channe
32 CNBC
33 W09BI
34 BET
35 VH-1
36 MTV
60/37 W65BG
61 LEN

RATE CARD

(Effective January 1, 1993)

* Indicates no increase from 1992 rates.

Limited Service	$7.95*
Satellite Service**	13.45
Preferred Basic Service***	$21.40
Additional Outlet (without converter)	$5.00*
Additional Outlet (Whole House-2 or more)	$7.50*
HBO, Showtime, Cinemax, Disney	$11.00*
Remote Control	$3.00*
Additional Manual Converter	$3.50*
Additional Remote Converter	$6.50*
New Installation (Preferred Basic Service)	$39.95
New Installation (Limited Service)	$39.95
Transfer of service	$14.95*
Reconnection	$39.95
Trip Charge	$39.95
VCR Install at Original Install Date	$10.00*
AB Switch Service Charge	$15.00*
Delete Outlet	$9.95*
A/O Installed at Original Install Date	$10.00*

** Satellite Service is available only in conjunction with Limited Service.
*** Preferred Basic Service = Limited Service Plus Satellite Service.
Retail Prices does not include 5% franchise fee or 7% state sales tax.

ATTACHMENT 3

RATE FREEZE CALCULATIONS

FCC RATE FREEZE COMPUTATION FORM

01. Community Unit ID#:	FL 0032	05. Respondent Name:	Crescent Cablevision of Tallahassee
02. Mailing Address (street):	3760 Hartsfield Road	06. Respondent Fax:	(407) 687-1167
03. Mailing Address (city):	Tallahassee	07. Respondent Phone:	(407) 686-9700
04. Mailing Address (state & zip):	FL 32301	08. Franchising Auth:	City of Tallahassee

Regulated Cable Services	Charge		Channels		Subscribers		Revenues	
Service Tier	4/5/93	(10-31-93)	4/5/93	(10-31-93)	4/5/93	(10-31-93)	4/5/93	(10-31-93)
09. TIER 1 (Basic)	7.95	8.13	13	12	42,597	43,494	337,412	346,669
10. TIER 2	13.95	11.62	20	17	42,401	43,205	569,782	502,127
11. TIER 3								
12. TIER 4								
13. Additional Regulated Tiers								

Other Regulated Cable Rev.	Charge		Equipment Units		Subscribers		Revenues	
	4/5/93	(10-31-93)	4/5/93	(10-31-93)	4/5/93	(10-31-93)	4/5/93	(10-31-93)
14. Converters -- NonAddressable	3.50	1.04	2365	23,001	2119	19,903	9252	25,269
15. Converters -- Addressable	-0-	2.46	-0-	3,023	-0-	3,761	-0-	7,529
16. Remotes	3.00	.43	2542	11,320	8454	10,540	34,721	5,112
17. Additional Outlets	[illegible]	-0-	[illegible]	-0-	22,637	-0-	69,717	-0-
18. New Install. Unwired Home	[illegible]	[illegible]	[redacted]		1,512	[illegible]	28,327	37,156
19. New Install. Prewired Home	[illegible]	[illegible]			See Rebate [illegible]		-0-	-0-
20. Service Changes No Visit	[illegible]	[illegible]			-0-	[illegible]	-0-	-0-
21. Service Changes Visit Req'd	[illegible]	[illegible]			See Fee [illegible]		-0-	-0-
22. Inside wire/Maint Fee Contract	[illegible]	[illegible]			-0-	[redacted]	-0-	18,906
23. Franchise Fees & other Fees	[illegible]	[illegible]	[illegible]	[illegible]			52,364	47,637
24. Regulated Equipment Sales	[redacted]						-0-	-0-
25. Other Regulated Revenues							-0-	-0-
26. Total Billed Monthly Charges for [redacted]							1,097,635	991,718
27. Total Subscribers receiving any [redacted]					[illegible]	[redacted]		

Other Services	Charge		Channels		Subscribers		Revenues	
a la carte Packages	4/5/93	(10-31-93)	4/5/93	(10-31-93)	4/5/93	(10-31-93)	4/5/93	(10-31-93)
28. a la carte Package 1	[redacted]	.65	[redacted]	4	[redacted]	43,444	[redacted]	27,430
29. a la carte Package 2								
30. Additional a la carte Pkg's								
31. Individual a la carte channels		[redacted]		[redacted]				
32. Other a la carte revenues						[redacted]		
33. Total Billed Monthly Charges for a l...								

FCC RATE FREEZE COMPUTATION FORMS
CITY OF TALLAHASSEE

<u>Footnote 1</u>: The charges listed on lines 18 - 21 are the published rates for the City of Tallahassee, which are generally discounted under current business practice. Line 18 revenues and subscribers represent total installation revenues and total connect activity which is what we currently track in the billing system.

<u>Footnote 2</u>: Franchise fees are passed through to customers based on the level of service and equipment they currently subscribe to. There is no set per monthly franchise fee charge.

<u>Footnote 3</u>: The April 5, 1993 revenues relating to the four (4) a la carte channels were not tracked separately, but were included as a subset of tier 1 (WTBS) and tier 2 (TNT, The Family Channel, The Nashville Network) revenues.

FCC RATE FREEZE COMPUTATION FORM

CUID: FL 0033

	Basic Service (Tier 1) 04/05/93		Basic Service (Tier 1) Date 10-31-93		CPS (Tier 2) 04/05/93		CPS (Tier 2) Date 10-31-93	
	Ch#	Channel Description	Ch#	Channel Description	Ch#	Channel Description	Ch#	Channel Description
1	02	[illegible]	05	WESH	03	TNT	04	CNN
2	05	WESH	07	[illegible]	04	CNN	06	USA
3	07	[illegible]	09	WFTV	06	USA	08	ESPN
4	09	WFTV	10	[illegible]	08	ESPN	11	QVC
5	10	[illegible]	12	[illegible]	11	QVC	13	Nickelodeon
6	12	[illegible]	18	[illegible]	19	Nickelodeon	18	E!
7	18	[illegible]	20	C-Span I	13	E!	21	ESPN 2
8	20	C-Span II	25	[illegible]	21	Channel Line-Up	23	Sunshine Sports
9	25	[illegible]	28	[illegible]	22	The Family Channel	26	Headline News
10	27	[illegible]	33	[illegible]	23	Sunshine Sports	27	Lifetime
11	33	[illegible]	60	[illegible]	24	The Nashville Network	28	[illegible]
12	60	[illegible]	61	Leon Educational	26	Headline News	30	Arts & Entertainment
13	61	Leon Educational			27	Lifetime	31	Weather Channel
14					29	The Discovery Channel	32	CNBC
15					30	Arts & Entertainment	34	BET
16					31	Weather Channel	35	VH-1
17					32	CNBC	36	MTV
18					34	BET		
19					35	VH-1		
20					36	MTV		
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								
32								
33								

N/A

FCC RATE FREEZE COMPUTATION FORM

CUID: FL 0033

	CPS (Tier 3) 04/05/93		CPS (Tier 3) Date ( )		CPS (Tier 4) 04/05/93		CPS (Tier 4) Date ( )	
	Ch#	Channel Description	Ch#	Channel Description	Ch#	Channel Description	Ch#	Channel Description
1								
2								
3								
4								
5								
6								
7								
8								
9								
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11								
12								
13								
14								
15								
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29								
30								
31								
32								
33								

12-17-93 02:56AM P005 #12
1 407 667 1167

FCC RATE FREEZE COMPUTATION FORM

CUID FL 0033

	a la carte Channels Moved or Created after 04/05/93			Date ([illegible])	a la carte Channels Moved or Created after 04/05/93			Date ( )
	Ch #	Channel Description	Ind. Rate	Pkg. Rate	Ch #	Channel Description	Ind. Rate	Pkg. Rate
1	02	WTBS	.33	.65				
2	03	TMC	.18	.65				
3	22	The Family Channel	.33	.65				
4	24	The Nashville Network	.33	.65				
5								
6								
7								
8								
9								
10								
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ATTACHMENT

Comcast is not in violation of the FCC's rate freeze. The monthly subscriber revenues for October, 1993 for cable services and equipment have decreased from $1,099,635 to $1,019,353. This includes the charges for new a la carte offerings.

ATTACHMENT 4

Comcast Cable Rate Card
(Effective September 1, 1993)

	Tallahassee
Programming Services*	
Limited Basic	$8.13
Standard Service	11.52
Value Pak (see below)	.65
Preferred Service (includes Limited Basic Standard Service, and Value Pak)	20.30
Equipment Rental	
Addressable Converter	2.45
Standard Converter	1.04
Remote Control	.43
Other Services*	
Additional Outlet	No Charge
Guide	.75
Pay-Per-View	Prices Vary
Service Charges	
CableGuard	.45
New Connect Installation charge	31.32
Prewire New Connect	38.49
Reconnect	32.08
Additional Outlet/Relocate Outlet (initial installation) - per outlet	12.83
Additional Outlet/Relocate Outlet (Separate Trip)-per outlet	25.66

Hourly Service Charge/Custom Install	25.00
Change of Service Charge (home visit required)	19.25
Change of Service (no home visit required)	1.99
Premium Service Programming*	
(Purchased Separately)	
HBO	12.00
Cinemax	12.00
Showtime	12.00
The Disney Channel	12.00
Additional Outlet Premium(s)	3.00
Value Pak Service (Purchased Separately)*	
TNT.	49
WTBS	.33
The Family Channel	.33
The Nashville Network	.33
Premium Service Packages*	
Feature Package* (Preferred Servcie, HBO, Showtime and Guide)	39.30
Family Package* (Preferred Service, Showtime, The Disney Channel and Guide)	39.90

*Applicable equipment rental charges not included.
Applicable fees and taxes will apply.

Important Notice!

COMCAST

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(0010, 0020,
0040, 0300)
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ATTACHMENT 5A